

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 2:10-cr-20005

Plaintiff,

HONORABLE NANCY G. EDMUNDS

-vs-

D-1 UMAR FAROUK ABDULMUTALLAB,
Defendant.

F I L E
JAN 19 2010
CLERK'S OFFICE
DETROIT

STIPULATED PROTECTIVE ORDER

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, the parties to the above criminal action do hereby stipulate and agree as follows:

1. In accordance with its obligations under Rule 16, the government will produce reports of interviews and other reports, witness statements and other discovery materials.
2. The discovery materials furnished by the government will be used by defense counsel only as necessary for the purpose of conducting pre-trial, trial, and appellate proceedings in this case and for no other purpose.
3. With respect to witness statements, the government shall redact all identifying information regarding each witness except for that person's name. These redacted witness statements can be disclosed to the defendant. The government will also produce to defense counsel a list of the name and address of each non-law enforcement witness. Defense counsel will only disclose the witness address list to other attorneys, paralegals or investigators working with defense counsel. The

address list shall not be disclosed to the defendant, witnesses or any other person.

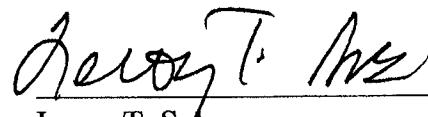
4. Defense counsel will not disclose any of the other materials provided by the government to anyone but the defendant, other attorneys, paralegals, or investigators working with them, and/or non-expert defense witnesses. Such individuals must agree in writing to be bound by the terms of this Stipulated Protective Order before receiving government discovery material.
5. Defense counsel may disclose government discovery material to experts consulted by defense counsel to furnish technical or expert services or to testify in the proceedings in this case. Such experts must agree in writing to be bound by the terms of this Stipulated Protective Order before receiving government discovery material.
6. With respect to copies of government discovery material provided to experts, all copies of that material shall be returned to defense counsel within 72 hours following the earlier of (i) the termination of these proceedings, or (ii) when the expert no longer needs such copies in order to assist the defense in this case.
7. Defense counsel will insure that the materials disclosed to any of the previously described persons will not be further disclosed. Any unauthorized disclosure will be brought to the attention of the court and shall be subject to a contempt hearing.
8. Upon final disposition of this case, or the termination of representation by counsel of the defendant, whichever is earlier, counsel for the defense shall promptly return all of the government discovery materials to the government.

SO STIPULATED:

FOR DEFENDANT UMAR FAROUK ABDULMUTALLAB:



Miriam L. Siefer



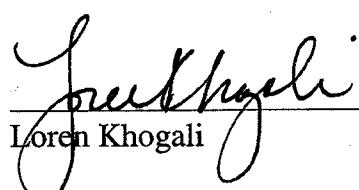
Leroy T. Soles



Jill L. Price



UMAR FAROUK ABDULMUTALLAB
Defendant



Loren Khogali

FOR THE UNITED STATES:

Jonathan Tukel
Jonathan Tukel

Cathleen M. Corken
Cathleen M. Corken

Michael C. Martin
Michael C. Martin

SO ORDERED, this 19 day of January, 2010

Nancy Edmunds
NANCY G. EDMUNDS
United States District Judge